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VIA ECF

May 14, 2020

Hon. Paul A. Engelmayer
United States District Court – Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: **Alexandra Canosa v. Harvey Weinstein, et al - Case No.: 1:18-cv-04115-PAE**

Dear Judge Engelmayer,

I represent the Defendant Harvey Weinstein (hereinafter “Mr. Weinstein”) in the abovementioned matter. I respectfully submit this letter in regard to the deadline of May 15, 2020 [See, Doc. No. 236] to respond to Plaintiff’s discovery demands pursuant to this Court’s order of March 2, 2020 [Doc. No. 226].

On this date, we received the consent of both counsel for the Plaintiff and the Co-Defendant for an extension of the date to serve the aforementioned response, which will contain sensitive financial information, so that the parties can first file a jointly proposed Protective Order and Electronically Stored Information (“ESI”) Protocol with the Court for approval. These documents are already in draft and have been circulated between the parties and we intend to meet-and-confer tomorrow.

For the foregoing reasons, we respectfully request that the Court issue an order extending the time for Mr. Weinstein to respond to the Plaintiff’s discovery request, as per the Court’s March 24, 2020 order [Doc. No. 236], from May 15, 2020 to a date to be determined, but not more than five (5) business days after the Court’s approval of the proposed Protective Order and ESI Protocol.


Respectfully Submitted,

*Imran H. Ansari*____
Imran H. Ansari, Esq.

CC: All Counsel of Record (via ECF)

The parties are to file their proposed joint protective order and ESI protocol no later than May 29, 2020. After the Court reviews, and presumably approves, those documents, it will set a prompt and firm deadline for defendant Weinstein to meet his discovery obligations.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

May 15, 2020